

# EXHIBIT A

**JACOBS & BARBONE, P.A.**

EDWIN J. JACOBS, JR.  
[ejacobs@jacobsbarbone.law](mailto:ejacobs@jacobsbarbone.law)

LOUIS M. BARBONE  
[lbarbone@jacobsbarbone.law](mailto:lbarbone@jacobsbarbone.law)

A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW

1125 PACIFIC AVENUE  
ATLANTIC CITY, NEW JERSEY 08401  
PHONE: (609) 348-1125  
FAX: (609) 348-3774  
WEBSITE: [WWW.JACOBSBARBONE.LAW](http://WWW.JACOBSBARBONE.LAW)

JOEL S. JUFFE  
[jjuffe@jacobsbarbone.law](mailto:jjuffe@jacobsbarbone.law)

DAVID CASTALDI  
[dcastaldi@jacobsbarbone.law](mailto:dcastaldi@jacobsbarbone.law)

January 11, 2021

**Via Certified Mail, R.R.R. and Regular Mail**

Gurbir S. Grewal, Attorney General  
Office of the Attorney General  
Department of Law & Public Safety  
Hughes Justice Complex  
25 W. Market Street  
P.O. Box 080  
Trenton, New Jersey 08625

**Via Certified Mail, R.R.R. and Regular Mail**

Barry Caldwell, Superintendent  
Atlantic City Board of Education  
1300 Atlantic Avenue, 5<sup>th</sup> Floor  
Atlantic City, New Jersey 08401

Re: Marty Small and LaQuetta Small  
Our File No. 16,993

Dear Attorney General Grewal & Superintendent Caldwell:

Please be advised this office represents Marty Small and LaQuetta Small in a potential civil lawsuit to be filed in the Superior Court of New Jersey, Law Division, Civil Part, Atlantic County or in the Federal District Court.

This notice is being forwarded to you in accordance with the terms of N.J.S.A. 56:8-4 and N.J.S.A. 59:8-7, and is intended to advise you of my clients' claims against the Atlantic City Board of Education, namely for the conduct of particular Board Members in announcing and holding a special Board meeting to address alleged illegal conduct of my clients which defamed them and was conducted to defame them and retaliate against them for political purposes. I offer the following information with respect to that claim.

1. My clients' full names and address are as follows:

Marty Small and LaQuetta Small  
116 Presbyterian Avenue  
Atlantic City, New Jersey 08401

2. Any and all notices regarding this claim are to be sent to me at the following address:

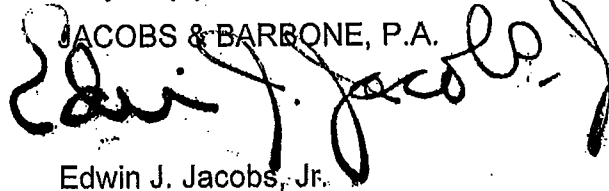
Edwin J. Jacobs, Jr., Esquire  
Jacobs & Barbone, P.A.  
1125 Pacific Avenue  
Atlantic City, New Jersey 08401

3. This claim arises from the retaliatory conduct of certain members of the Atlantic City Board of Education to defame my clients' good names and reputations in the Atlantic City and Atlantic County communities, and is the product of political retaliation. We have evidence that certain Board Members conspired with political organizer Craig Callaway to defame the good names and reputations of my clients immediately preceding the November 2020 special election which involved Mayor Marty Small. Certain members of the Board conspired with Callaway to impute allegations of criminal conduct on my clients for the criminal conduct of LaQuetta Small's cousin, Kayan Frazier. All of this information regarding Kayan Frazier had been known by certain members of the Board in 2017 or 2018. But in concert with Callaway, those members of the Board denied any knowledge of the criminal acts of Frazier and caused a special Board meeting to take place on October 13, 2020 to publicize alleged criminal activity by my clients in "covering up", "not disclosing" or "assisting" the child molesting conduct of Frazier, all of which is wholly false. One week after that special meeting, Craig Callaway appeared on two live broadcasts and defamed the Smalls: October 19, 2020 and October 26, 2020. The Board engaged in a conspiracy to defame the Small name and harm Mayor Marty Small's chances of winning the November 2020 Special Election.
4. My clients have suffered injuries and damages to their good name and reputation, standing in the community, personal humiliation, mental anguish and business economic losses as a result of these defamatory schemes.
5. The public entities and/or employees alleged to have contributed to my clients' injuries, damages and losses are those individuals on the Atlantic City Board of Education, including but not limited to Board President John Devlin, and any and all agents and members of the Board who caused and otherwise facilitated publication of defamatory statements that have impaired my clients' reputation and standing in the community by facilitating the disclosure of false and untrue information knowingly and/or in reckless disregard of such falsity.

6. At this time, my clients' claims remain under investigation by my office and the full extent of their claims, injuries and damages is yet to be determined. As such I reserve the right to supplement the claim accordingly.

Very truly yours,

JACOBS & BARBONE, P.A.

A handwritten signature in black ink, appearing to read "Edwin J. Jacobs, Jr.", is written over the printed name.

Edwin J. Jacobs, Jr.

EJJ:lsg

cc: Marty & LaQuetta Small